From: Sorrell, Virginia

Sent: Monday, April 15, 2019 06:58 AM

To: Mia, Marcia; Chapman, Apple

CC: Brooks, Phillip; Sullivan, Tim

Subject: RE: Storage Vessel compliance alert

Attachments: Whiting First Response to March 2016 CAA 114 Request - May 31 2016.pdf; SV_PT_additional info 4.12.19.docx; EPA-HQ-OAR-2010-0505-4887.pdf; 114 - April 2018

Quarterly Meeting corrected.pptx

Hi Marcia,

Ex. 5 AC/DP

Ex. 5 AC/DP | Sorry I didn't get this out on Friday - I left my power cord at home and ran out of battery before I found wifi after the drive. I will be in tomorrow if you want to discuss anything. | Ex. 5 AC/DP | Ex. 5 AC/DP |, including anything you think I missed there.

Copying Apple, Phill, and Tim in case they also want to review before we send to

Ginny

Patrick.

Virginia Sorrell

Air Enforcement Division

Office of Civil Enforcement

U.S. Environmental Protection Agency

Phone: 303-312-6669

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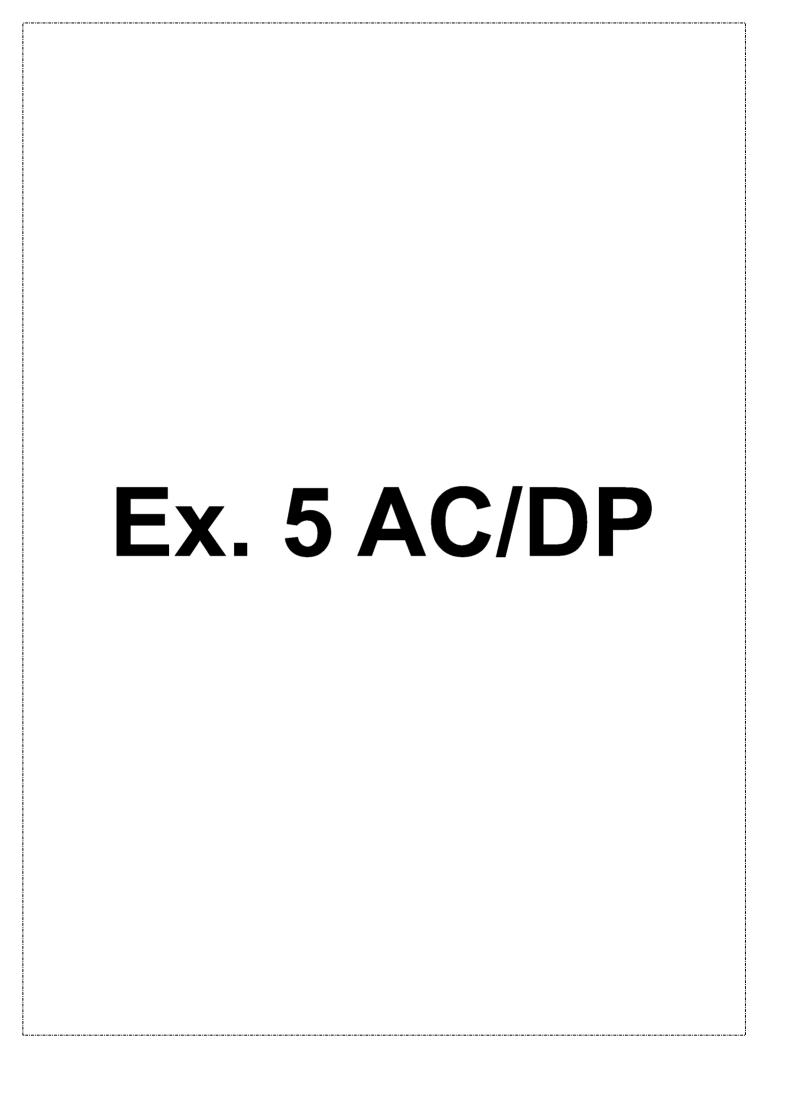
From: Mia, Marcia

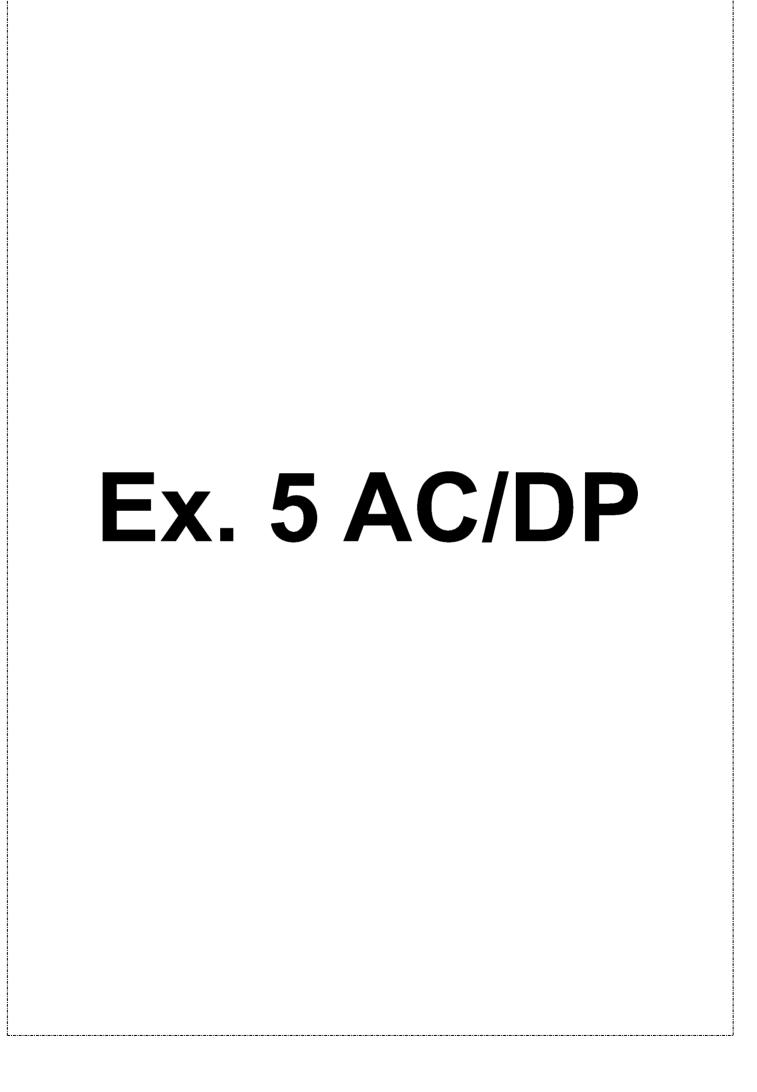
Sent: Thursday, April 11, 2019 3:09 PM

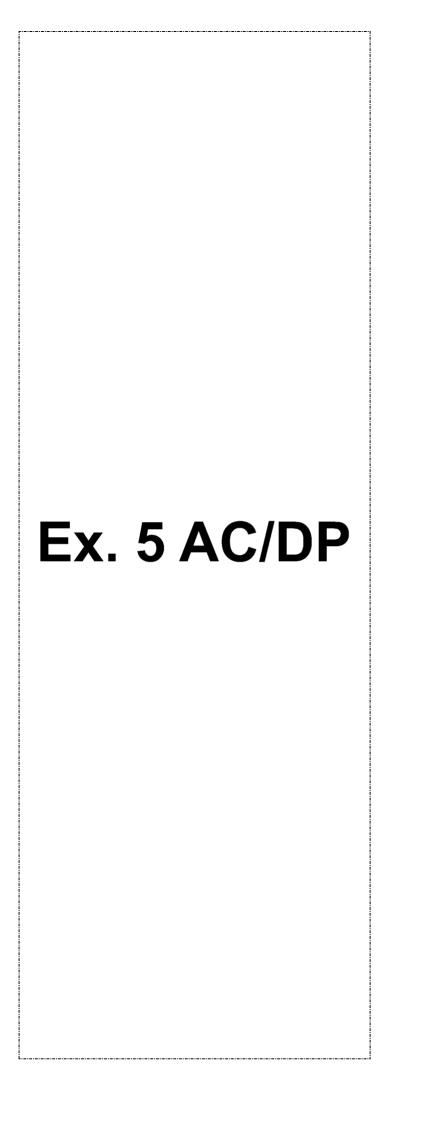
To: Chapman, Apple <Chapman.Apple@epa.gov>

Cc: Sorrell, Virginia <Sorrell.Virginia@epa.gov>; Brooks, Phillip
<Brooks.Phillip@epa.gov>; Sullivan, Tim <Sullivan.Tim@epa.gov>

Subject: RE: Storage Vessel compliance alert







Ex. 5 AC/DP

Conclusion: The proposed applicability at 60.5395 requires an AD based on the throughput PER storage vessel and the Records of 5410 require a flow meter to make the determination, per storage vessel. While we changed from throughput to VOC TPY, we didn't discuss changing any of the per tank determinations or our BSER analysis.

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

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From: Chapman, Apple

Sent: Thursday, April 11, 2019 4:45 PM

To: Traylor, Patrick <traylor.patrick@epa.gov>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>; Sorrell, Virginia <Sorrell.Virginia@epa.gov>;
Brooks, Phillip <Brooks.Phillip@epa.gov>; Sullivan, Tim <Sullivan.Tim@epa.gov>

Subject: Storage Vessel compliance alert

Patrick,

Ex. 5 Deliberative Process (DP)

Thanks.

Apple Chapman

Deputy Director, Air Enforcement Division

Office of Civil Enforcement

(202) 564-5666 or (202) 841-6076